



**State of New Jersey**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
DIVISION OF HAZARDOUS WASTE MANAGEMENT  
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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO. P 905 517 938

3 1 AUG 1990

Mr. Cristopher Anderson, Manager  
Environmental Affairs  
M.A. Hanna Company  
1301 E. Ninth Street  
Suite 3600  
Cleveland, OH 44114-1824

Dear Mr. Anderson:

Re: L.E. Carpenter and Company  
Response of the Laboratory's Comments on the  
Memorandum dated April 26, 1990 with regard to  
the Departmental Quality Assurance Review  
of the Resubmissions

The New Jersey Department of Environmental Protection (Department) has reviewed the above referenced laboratory response and validated resubmissions based on ACO Tier I deliverable requirements and has the following comments for your information and/or action where required:

Section 1: Response of the Laboratory's Comments

General:

Target Chemical List (TCL) analytes are required for analysis in the chain of custody, since the project has been following the latest EPA guidance. Also xylenes were referenced as target volatile compounds in Department comments transmitted to Richard E. Hahn, Esq. with letter of March 5, 1990. L.E. Carpenter should eliminate references to "Priority Pollutants in all documents, e.g. Sample Summary Sheets, to avoid inconsistency and confusion, such as the target compounds, acetone, xylene(m) and xylene (total), found in sample 19067-PP28, not being reported.

L.E. Carpenter can ignore the Department's comments on the laboratory not meeting the Method Detection Limits as CRQL was met.



19222-MW-11s

The attachment 3 provided by the laboratory was illegible. Therefore, the Department still could not perform the review for this sample until the values are submitted, e.g. make telephone transmittal to expedite review.

Volatiles:

19222-MW-1

Since Target Compound List was requested for analysis, the results for 2-chloroethyl vinyl ether can be ignored.  
19067-TP28

The methylene chloride result remains rejected; the data remains questionable and is of only qualitative use. Tier I refers to those deliverables which must be submitted by the laboratory. It is the method and not the Tier which determines which QA/QC criteria are to be followed. The Department allows up to 3 times the CRQL of the common laboratory contaminants in the method blank.

The laboratory did not explain why acetone, xylene(m) and xylene (total) were not reported. As the laboratory was analyzing for TCL analytes, those compounds must be reported in the sample summary sheet.

In the future the laboratory should address deviations from the Methodology requirements in the Non-Conformance Summary.

19067-TP7B

In the future, peaks eluting at retention times later than the last target compounds still must be library searched regardless of the fraction to which they belong.

19073-HA2

In the future, peaks eluting at retention times later than the last target compounds still should be library searched regardless of what fraction they belong.

Base-Neutrals:

19067-TP28

In the future, if the dilution is performed for the sample and the surrogates can not be recovered, the undiluted analysis should be provided to demonstrate surrogate recovery was within the QC limits. If pre-screening was performed on this sample, the document for the screening should be provided to the Department.

Tier I refers to those deliverables which must be submitted by the laboratory but it is the method and not the Tier which determines the QA/QC criteria that are to be followed. Therefore, in this instance, ZD

requirements for CCC is specified by the methodology and the sample results therefore remain rejected.

19057-SS3 & 19057-SW3

Same comment as above. In this instance, the Internal Standard area counts and CCC requirements are specified by methodology and must be followed.

19067-TP37

Same comment as above.

19067-TP63

Same comment as 19067-TP28.

The Department allows up to 3 times the CRQL of the common laboratory contaminants in the method blank.

19067-TP7B

Same comment as 19067-TP28

19073-HA2

Same comment as 19067-TP28

Pesticide/PCBs:

19067-TP7B

L.E. Carpenter must be aware that the confirmation results can not be accepted since DBC retention shift was outside the QC limits. Since pesticides do not appear to be of concern at this time, reanalysis of these samples is not needed but, the laboratory must correctly calculate DBC retention time shift.

Section 2: Review of the Resubmissions

19057-SS3 & SW3

Samples 19057-SW3, 19057-TP (Trip Blank) and 19057-SSFB (Field Blank) are no longer rejected. Sample 19057-SS3 and 19057-SWFB, however, remain conditionally rejected because the initial calibration summary associated with these samples are still missing. The deficiencies must be corrected to remove the conditional label on these results.

In the initial and continuing calibration summaries, the laboratory did not provide the Relative Response Factors (RRF) for the surrogates. For further submissions, the RRFs for surrogates must be provided.

In sample 19057-TP (Trip Blank), the Department found that the area reported for methylene chloride in the quantitation report does not match the area reported in the mass spectra proof. The concentration for methylene chloride would be 15.7 ug/l if the manually integrated area in the quantitation report was used; the laboratory, however, reported 6.2 ug/l but

the Department could not determine how this value was obtained. Please explain. In addition, vinyl acetate which was found at a concentration of 0.9 ug/l should have been reported.

In sample 1957-SSFB, a peak with the height over 60% of the highest peak in the chromatogram was found at the retention time around 27.00 minutes but was not reported by the laboratory. Please explain this omission.

The Department could not perform a complete review for sample 19057-SS3 and 19057-SWFB due to missing initial calibration summary. However, the Department examined the chromatogram for sample 19057-SS3 and found that two broad peaks at retention times around 14.5 and 16.2 minutes were detected but were not reported. These omissions must be explained.

Please take actions where indicated and respond within ten (10) working days of receipt of these comments.

Should you have any questions, you may contact me at (609) 633-1455.

Very truly yours,



Edgar G. Kaup, P.E., Case Manager  
Bureau of Federal Case Management

SW

c. J. Prendergast, BEERA  
V. Cappello, WSI  
J. Josephs, USEPA II